

JJI/JTM: USAO#2018R00360

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA CLERK'S OFFICE
AT BALTIMORE CRIMINAL NO. GLR-18-0288

v. K BY * DEPI(Coercion and Enticement of a Minor,
HOWARD KEITH GOODSON, * 18 U.S.C. § 2422(b); Travel with Intent
Defendant. * to Engage in Illicit Sexual Conduct,
* 18 U.S.C. § 2423(b); Forfeiture,
* 18 U.S.C. § 2428)

INDICTMENT

COUNT ONE
(Coercion and Enticement of a Minor)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times material to this Indictment:

1. Howard Keith Goodson (“GOODSON”), age 49, was a resident of Hatfield, Pennsylvania.
2. “Jane Doe” was a resident of Maryland, approximately 15 years old, and a student in the ninth grade.

The Charge

3. From in or about October 2017, and through on or about April 16, 2018, in the District of Maryland, the Eastern District of Pennsylvania, and elsewhere, the defendant,

HOWARD KEITH GOODSON,

did use and attempt to use any facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce any individual who had not attained the age of 18 years, to wit: Jane Doe, to engage in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2422(b)

COUNT TWO
(Travel with Intent to Engage in Illicit Sexual Conduct)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 2 of Count One are incorporated by reference here.

2. From in or about January 2018 through on or about April 16, 2018, in the District of Maryland, the Eastern District of Pennsylvania, and elsewhere, the defendant,

HOWARD KEITH GOODSON,

did travel in interstate commerce, from Pennsylvania to Maryland, for the purpose of engaging in any illicit sexual conduct with another person, to wit: Jane Doe.

18 U.S.C. § 2423(b)

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. The allegations in Counts One and Two of this Indictment are incorporated by reference here.

2. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as a part of any sentence, in accordance with Title 18, United States Code, Section 2428, upon the defendant's conviction of the offenses set forth in Counts One and Two of this Indictment.

3. As a result of the offenses set forth in this Indictment, the defendant,

HOWARD KEITH GOODSON,

shall forfeit to the United States of America:

a. The defendant's interest in any property, real or personal, used or intended to be used to commit or to facilitate the commission of the offenses; and

b. Any property, real or personal, that constitutes or is derived from proceeds obtained, directly or indirectly, as a result of the offenses.

4. Such property includes, but is not necessarily limited to, all property seized by law enforcement officers from the defendant, or abandoned by the defendant, that was used or intended to be used to commit or facilitate the commission of the offenses charged in the Indictment, including, but not limited to, the following:

a. Blue Dodge Ram, VIN: 1D3HV13T29J521641, bearing Pennsylvania registration YMN9357; and

b. Black Apple iPhone X, IMEI: 356722088271019.

5. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property of the defendant pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2428

Robert K. Hur
United States Attorney

SIGNATURE REDACTED

Foreperson:

5.15.18
Date